EXHIBIT 2

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 2 of 36 HENAO V. PARTS AUTHORITY

DATE	Description	Time	Rate	Fee
	Spoke to plaintiff, drafted			
10/29/2019	notes	0.4	\$ 500.00	\$ 200.00
	Spoke to plaintiff, drafted			
10/29/2019	notes	0.4	\$ 500.00	\$ 200.00
10/29/2019	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
	Spoke to plaintiff, email to			
10/29/2019	plaintiff	0.2	\$ 500.00	\$ 100.00
11/21/2019	Reviewed filings	0.1	\$ 500.00	\$ 50.00
11/22/2019	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
	Prepared Pro Hac Vice			
	documents, researched Pro			
	Hac Vice process, ordered			
11/22/2019	certificates of good standing	0.8	\$ 500.00	\$ 400.00
	Conference with co-counsel,			
	called court clerk, conference			
11/22/2019	with co-counsel	0.5	\$ 500.00	\$ 250.00
11/26/2019	Reviewed emails	0.1	\$ 500.00	\$ 50.00
	Spoke to witness, drafted			
	notes, email to witness,			
12/2/2019	scheduled follow-up call	0.4	\$ 500.00	\$ 200.00
	Received and reviewed			
12/2/2019	certificates of good standing	0.1	\$ 500.00	\$ 50.00
	Prepared Pro Hac Vice			
	documents, tried to			
12/2/2019	electronically file	0.4	\$ 500.00	\$ 200.00
	Spoke to witness and his			
	translator several times,			
12/2/2019	drafted declarations	2.5	\$ 500.00	\$ 1,250.00
	Spoke to court clerk, email to			
12/3/2019	clients	0.3	\$ 500.00	\$ 150.00
	Reviewed emails from			
	witness's translator,			
	response email, revised			
12/3/2019	declarations	0.3	\$ 500.00	\$ 150.00
	Spoke to witness and			
	translator, revised			
	declarations, email to co-		4	
12/3/2019	counsel	0.5	\$ 500.00	\$ 250.00
	Reviewed email, response to	_	4	
12/4/2019	co-counsel	0.1	\$ 500.00	\$ 50.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 3 of 36 HENAO V. PARTS AUTHORITY

	Reviewed email, response to				
	witness, reminder email to				
12/4/2019	co-counsel	0.2	\$ 500.00	\$	100.00
	Reviewed emails, email to co-				
12/5/2019	counsels	0.1	\$ 500.00	\$	50.00
12/6/2019	Downloaded filings	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
12/7/2019	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Reviewed defendant's filings				
	in opposition to TRO,				
	reviewed release of Parts				
12/9/2019	Authority	0.4	\$ 500.00	\$	200.00
	Reply to Parts Authority's				
12/9/2019	filings	3.6	\$ 500.00	\$	1,800.00
	Revised reply to Parts				
12/10/2019	Authority's arguments	1.0	\$ 500.00	\$	500.00
	Researched and drafted				
	opposition to Diligent's				
	request for a motion to				
12/10/2019	dismiss	1.8	\$ 500.00	\$	900.00
	Reviewed co-counsel's				
	additions to reply to Parts				
	Authority's opposition to				
12/10/2019	motion for TRO	0.1	\$ 500.00	\$	50.00
	Reviewed email, response to		4	_	
12/10/2019	co-counsel	0.1	\$ 500.00	\$	50.00
	Reviewed email, response to		4	_	
12/13/2019	co-counsel	0.1	\$ 500.00	\$	50.00
42/42/2040	Strategy conference with co-	0.2	4 500 00	_	450.00
12/13/2019	counsel	0.3	\$ 500.00	\$	150.00
42/42/2040	Researched and drafted first	2.2	4 500 00		4 600 00
12/13/2019	amended complaint	3.2	\$ 500.00	\$	1,600.00
42/44/2040	Researched and drafted first	4.6	¢ 500 00	۲.	2 200 00
12/14/2019	amended complaint Drafted first amended	4.6	\$ 500.00	\$	2,300.00
12/14/2010	complaint, email to co- counsels	0.0	¢ 500 00	۲	200.00
12/14/2019	Travel to New York for court	0.6	\$ 500.00	\$	300.00
12/15/2019		2.5	\$ 500.00	\$	1 250 00
12/15/2019	hearing Downloaded and reviewed	2.5	\$ 500.00	ş	1,250.00
12/16/2019	filings	0.3	\$ 500.00	\$	150.00
12/16/2019	Prepared for court hearing	3.0	\$ 500.00	\$	1,500.00
12/17/2019	Court hearing	1.0	\$ 500.00	\$	500.00
12/17/2019	Court Hearing	1.0	00.00 ډ	Ą	500.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 4 of 36 HENAO V. PARTS AUTHORITY

12/17/2019	Conference with co-counsel	0.7	\$ 500.00	\$	350.00
12/17/2019	Travel back to St. Louis	4.0	\$ 500.00	\$	2,000.00
·	Reviewed court order,			-	·
12/18/2019	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Reviewed draft discovery				
12/19/2019	requests	0.8	\$ 500.00	\$	400.00
	Reviewed draft discovery,				
12/19/2019	email to co-counsel	0.6	\$ 500.00	\$	300.00
	5				
	Reviewed emails regarding				
10/00/0010	discovery requests,	0.1	4 = 00 00		50.00
12/23/2019	downloaded current versions	0.1	\$ 500.00	\$	50.00
	Reviewed emails,				
10/01/0010	•	0.0	4 = 00 00		100.00
12/24/2019	requests	0.2	\$ 500.00	\$	100.00
	Duefted etimoletica according				
	·				
	•				
12/26/2010	· · · · · · · · · · · · · · · · · · ·	0.4	¢ 500 00	÷	200.00
12/26/2019		0.4	\$ 500.00	\$	200.00
42/26/2040	-	0.4	¢ 500 00	<u>,</u>	50.00
12/26/2019	· ·	0.1	\$ 500.00	\$	50.00
	· · ·				
12/27/2010	, , , , , , , , , , , , , , , , , , , ,	0.2	¢ 500 00	خ	150.00
12/2//2019		0.5	\$ 500.00	Ş	150.00
	· ·				
12/27/2010		0.1	\$ 500 00	¢	50.00
12/2//2019	· ·	0.1	7 JUU.UU	۲	30.00
12/30/2019		0.2	\$ 500.00	\$	100.00
12/30/2013	•	0.2	7 300.00	7	100.00
]				
1/2/2020	· ·	0.2	\$ 500.00	Ś	100.00
-, -, -020		J.2	+ 220.00	т	_55.55
	Edited defendant's proposed				
	• •				
1/2/2020	email to co-counsel	0.4	\$ 500.00	\$	200.00
12/24/2019 12/26/2019 12/26/2019 12/27/2019 12/27/2019 1/2/2020	downloaded discovery requests Drafted stipulation regarding impermissible contacts with plaintiff's attorneys' clients, email to co-counsel Emailed draft stipulation to defendant's attorneys Reviewed defendant's proposed stipulation, draft email to opposing attorney, email to co-counsel Reviewed email from co-counsel, response to opposing attorney regarding stipulation Reviewed emails, revised draft email to opposing attorney Conference with co-counsel and opposing attorney regarding possible stipulation, drafted notes, spoke to co-counsel Edited defendant's proposed stipulation regarding identifying possible plaintiffs,	0.2 0.4 0.1 0.3 0.1 0.2	\$ 500.00 \$ 500.00 \$ 500.00 \$ 500.00 \$ 500.00 \$ 500.00	\$ \$ \$ \$ \$	200 50 150 100

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 5 of 36 HENAO V. PARTS AUTHORITY

	Spoke to co-counsel				
	regarding amended				
1/2/2020	complaint	0.2	\$ 500.00	\$	100.00
	Reviewed defendants'				
	supplement in opposition to				
	motion for temporary				
	restraining order, reviewed				
	SDNY cases on surreplies				
	filed without leave, email to				
1/3/2020	co-counsel	0.8	\$ 500.00	\$	400.00
	Reviewed emails from co-				
1/3/2020	counsel, response email	0.2	\$ 500.00	\$	100.00
	Reviewed email regarding				
	proposed method to resolve				
	TRO dispute, email to co-				
1/3/2020	counsel	0.1	\$ 500.00	\$	50.00
	Reviewed and revised first				
	amended complaint, looked				
1/3/2020	up cites	3.4	\$ 500.00	\$	1,700.00
	Reviewed defendant's				
1/7/2020	proposed stipulation	0.1	\$ 500.00	\$	50.00
	Reviewed edits to				
	defendant's proposed				
	stipulation, emailed thoughts				
1/8/2020	to co-counsel	0.2	\$ 500.00	\$	100.00
	Conference with co-counsel				
	regarding content of				
1/8/2020	stipulation	0.3	\$ 500.00	\$	150.00
1/8/2020	Edited draft stipulation	0.2	\$ 500.00	\$	100.00
1/9/2020	Spoke to co-counsel	0.2	\$ 500.00	\$	100.00
	Reviewed defendant's emails				
	regarding stipulation				
	language, emailed thoughts			١.	
1/10/2020	to opposing attorney	0.4	\$ 500.00	\$	200.00
	Reviewed draft response				
	email regarding stipulation,		4		
1/10/2020	email to co-counsel	0.1	\$ 500.00	\$	50.00
4 /4 0 /2 2 2 2	Reviewed email regarding	0.1	d 500 00	,	
1/10/2020	stipulation issues	0.1	\$ 500.00	\$	50.00
	Reviewed draft responses to				
	opposing attorney regarding				
1/10/2020	stipulation, email to co-	0.1	¢ 500 00	۲	F0.00
1/10/2020	counsel	0.1	\$ 500.00	\$	50.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 6 of 36 HENAO V. PARTS AUTHORITY

	Paviawad amail raspansa ta		1	
	Reviewed email, response to			
4 /42 /2020	co-counsel regarding	0.4	4 500 00	50.00
1/13/2020	stipulation terms	0.1	\$ 500.00	\$ 50.00
	Reviewed emails, draft email			
	regarding stipulation			
	language, response to co-			
1/13/2020	counsel's draft email	0.2	\$ 500.00	\$ 100.00
	Reviewed new draft			
	stipulation, email to co-			
1/13/2020	counsel	0.1	\$ 500.00	\$ 50.00
	Reviewed email from			
	opposing attorney regarding			
1/14/2020	stipulation language	0.1	\$ 500.00	\$ 50.00
	Reviewed emails regarding			
	stipulation language,			
	reviewed working draft of			
	stipulation, email to co-			
1/14/2020	counsel	0.3	\$ 500.00	\$ 150.00
	Reviewed email from co-			
1/14/2020	counsel, response email	0.1	\$ 500.00	\$ 50.00
	Draft letter to court			
	regarding meet and confer			
1/14/2020	efforts	1.8	\$ 500.00	\$ 900.00
	Reviewed email, response to			
1/14/2020	co-counsel	0.1	\$ 500.00	\$ 50.00
	Conference with opposing			
	attorney and co-counsel			
	regarding report to court,			
1/14/2020	drafted notes	0.4	\$ 500.00	\$ 200.00
	Reviewed latest version of			
	report to court regarding			
	stipulation efforts, emails to			
1/14/2020	co-counsels	0.3	\$ 500.00	\$ 150.00
	Reviewed emails,			
1/15/2020	downloaded filings	0.1	\$ 500.00	\$ 50.00
	Reviewed defendant's email			
	regarding arbitration			
	agreement by named			
	plaintiffs, compared to			
1/15/2020	amended complaint	0.2	\$ 500.00	\$ 100.00
1/16/2020	Reviewed court order	0.1	\$ 500.00	\$ 50.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 7 of 36 HENAO V. PARTS AUTHORITY

	Researched preemption of				
	Arizona claims, emailed				
	research results to co-				
1/16/2020	counsel	1.8	\$ 500.00	\$	900.00
1/10/2020	Conference with co-counsel,	2.0	Ψ 300.00	Ψ	300.00
	opposing attorney, and court				
1/17/2020	clerk	0.2	\$ 500.00	\$	100.00
1/17/2020	Researched possible travel	0.2	7 300.00	۲	100.00
1/17/2020	for mediation	0.3	\$ 500.00	\$	150.00
2/2//2020	Spoke to court clerk,	0.0	7 000.00	τ	
	recorded scheduling, email				
1/17/2020	to opposing attorney	0.1	\$ 500.00	\$	50.00
2,27,2020	Reviewed court order, email	0.2	φ 500.00	Ψ	30.00
1/17/2020	to co-counsel	0.2	\$ 500.00	\$	100.00
1/11/2020	Position statement to	0.2	7 300.00	Ψ	100.00
1/19/2020	magistrate judge	1.7	\$ 500.00	\$	850.00
1/13/2020	Attempted to contact court	1.7	7 300.00	7	050.00
	regarding mediation,				
	researched court				
	requirements, conferenced				
1/21/2020	in for mediation	0.2	\$ 500.00	\$	100.00
1/21/2020	Mediation with magistrate	0.2	\$ 300.00	Ą	100.00
	judge, drafted notes,				
1 /21 /2020	conference with co-counsel	1.8	\$ 500.00	\$	000 00
1/21/2020	Reviewed emails, response	1.0	\$ 500.00	Ş	900.00
1/21/2020	to co-counsel	0.2	\$ 500.00	\$	100.00
1/21/2020	Tried to find translator	0.2	\$ 500.00	Ş	100.00
	requested by defendants,				
4 /24 /2020	spoke to named plaintiffs,	0.5	¢ 500 00	<u> </u>	250.00
1/21/2020	emailed to co-counsel	0.5	\$ 500.00	\$	250.00
4 /22 /2020	Reviewed defendant's pre-	0.0	¢ 500.00	,	400.00
1/23/2020	motion letter	0.2	\$ 500.00	\$	100.00
4 /22 /222	Reviewed defendant's letter	0.4	4		50.00
1/23/2020	regarding discovery issues	0.1	\$ 500.00	\$	50.00
4 /00 /000	Reviewed draft stipulation,	0.0	4 500 00		4.0.0.0.
1/23/2020	email edits to co-counsel	0.2	\$ 500.00	\$	100.00
4 /00 /000	Reviewed draft no contact		4 500 00		
1/23/2020	form	0.1	\$ 500.00	\$	50.00
. / /	Reviewed court order,		4		
1/23/2020	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Conference with co-counsel		1		
1/23/2020	regarding tasks needed	0.2	\$ 500.00	\$	100.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 8 of 36 HENAO V. PARTS AUTHORITY

	D : 1.16 1.11			
	Reviewed defendant's			
	edits/comments to			
4	stipulation consent/decline	_		
1/25/2020	form, email to co-counsel	0.1	\$ 500.00	\$ 50.00
	Researched and drafted			
	response to defendant's pre-			
1/25/2020	motion letter	2.1	\$ 500.00	\$ 1,050.00
	Opposition to defendant's			
	second letter motion to			
1/26/2020	dismiss	1.9	\$ 500.00	\$ 950.00
	Opposition to defendant's			
	second letter motion to			
1/26/2020	dismiss	1.2	\$ 500.00	\$ 600.00
	Email to co-counsels			
	explaining remaining			
1/26/2020	jurisdiction issues	0.2	\$ 500.00	\$ 100.00
	Reviewed co-counsel's edits,			
1/26/2020	response to co-counsel	0.1	\$ 500.00	\$ 50.00
	Reviewed email, downloaded			
1/27/2020	stipulation	0.1	\$ 500.00	\$ 50.00
	Reviewed emails, response			
	to co-counsel regarding			
1/28/2020	consensus with stipulation	0.1	\$ 500.00	\$ 50.00
	Reviewed discovery dispute			
1/29/2020	letter, email to co-counsel	0.2	\$ 500.00	\$ 100.00
	Reviewed court order			
	denying motion for TRO as			
	moot, downloaded order			
1/29/2020	based on parties' stipulation	0.1	\$ 500.00	\$ 50.00
1/30/2020	Email to co-counsel	0.1	\$ 500.00	\$ 50.00
	Reviewed and revised			
	opposition to pre-motion			
	letter requiring leave to file			
	motion to dismiss, email to			
1/30/2020	co-counsel	0.6	\$ 500.00	\$ 300.00
	Reviewed emails,			
1/31/2020	downloaded filings	0.1	\$ 500.00	\$ 50.00
, ,	Reviewed emails regarding			
	prior agreement to SDNY			
	venue, researched and			
1/31/2020	drafted response	0.8	\$ 500.00	\$ 400.00
, ==, ====			,	 130.03

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 9 of 36 HENAO V. PARTS AUTHORITY

	Reviewed and revised				
	discovery, searched for				
1/31/2020	supporting case law	1.0	\$ 500.00		500.00
1/31/2020	Spoke to co-counsel	0.1	\$ 500.00	\$	50.00
	Reviewed court order, spoke				
	to co-counsel regarding				
2/3/2020	letter to court	0.1	\$ 500.00	\$	50.00
	Reviewed co-counsel's letter				
2/3/2020	to court, email to co-counsel	0.1	\$ 500.00	\$	50.00
	Reviewed email, response to				
	co-counsel regarding				
	wording of request for				
2/3/2020	extension	0.1	\$ 500.00	\$	50.00
	Reviewed letter to court,				
2/4/2020	email to co-counsel	0.1	\$ 500.00	\$	50.00
	Downloaded and reviewed				
	court order, recorded				
2/4/2020	scheduling	0.1	\$ 500.00	\$	50.00
	Reviewed letter regarding				
	motion to stay discovery,				
	recorded scheduling, drafted				
2/6/2020	notes for responses	0.4	\$ 500.00	\$	200.00
	Spoke to co-counsel				
2/6/2020	regarding defendant's filing	0.1	\$ 500.00	\$	50.00
	Reviewed email regarding				
	response to motion to stay				
	discovery, emailed thoughts				
2/7/2020	to co-counsel	0.2	\$ 500.00	\$	100.00
	Reviewed court order,				
2/8/2020	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Reviewed response to pre-				
2/11/2020	motion letter	0.3	\$ 500.00	\$	150.00
	Reviewed court order,				
2/13/2020	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Prepared for motion				
2/14/2020	argument	1.5	\$ 500.00	•	750.00
2/14/2020	Motion to stay argument	0.7	\$ 500.00		350.00
2/14/2020	Reviewed court order	0.1	\$ 500.00	\$	50.00
3/4/2020	Email to co-counsel	0.1	\$ 500.00	\$	50.00
	Reviewed and revised initial				
	disclosures, email to co-				
3/6/2020	counsel	0.5	\$ 500.00	\$:	250.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 10 of 36 HENAO V. PARTS AUTHORITY

	Reviewed email, response to			
	co-counsel regarding initial			
3/6/2020	disclosures language	0.1	\$ 500.00	\$ 50.00
	Reviewed defendant's initial			
3/6/2020	disclosures	0.1	\$ 500.00	\$ 50.00
3/11/2020	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
	Reviewed email regarding			
	information needed from			
	clients, response to co-			
3/13/2020	counsel	0.1	\$ 500.00	\$ 50.00
	Conference with co-counsel,			
3/23/2020	drafted notes	0.4	\$ 500.00	\$ 200.00
	Reviewed email regarding			
	structure of new complaint,			
3/24/2020	email to co-counsel	0.2	\$ 500.00	\$ 100.00
	Called prospective opt-ins to			
	obtain proof of employment,			
	drafted notes, emailed			
3/24/2020	results to co-counsel	1.0	\$ 500.00	\$ 500.00
	Revised and edited draft			
3/25/2020	second amended complaint	1.3	\$ 500.00	\$ 650.00
	Conference and email with			
3/25/2020	co-counsel	0.2	\$ 500.00	\$ 100.00
	Revised and edited draft			
3/25/2020	second amended complaint	1.5	\$ 500.00	\$ 750.00
	Revised and edited draft			
3/25/2020	second amended complaint	1.0	\$ 500.00	\$ 500.00
	Reviewed email from co-			
	counsel regarding second			
	amended complaint			
3/25/2020	language	0.1	\$ 500.00	\$ 50.00
	Reviewed email from co-			
	counsel, response to co-			
	counsel regarding content of			
3/26/2020	second amended complaint	0.1	\$ 500.00	\$ 50.00
	Reviewed co-counsel's email			
	regarding information from			
3/26/2020	possible plaintiffs	0.1	\$ 500.00	\$ 50.00
	Reviewed email regarding			
	content of second amended			
3/26/2020	complaint, response emails	0.2	\$ 500.00	\$ 100.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 11 of 36 HENAO V. PARTS AUTHORITY

	Reviewed court order and				
	emails regarding status				
3/26/2020	report, recorded scheduling	0.1	\$ 500.00	\$	50.00
2, 2, 2	Reviewed co-counsel's edits		,	•	
	to second amended				
3/26/2020	complaint	0.1	\$ 500.00	\$	50.00
	Reviewed draft status report		·		
	to court and emails regarding				
3/27/2020	content thereof	0.1	\$ 500.00	\$	50.00
	Reviewed email and				
	documents regarding named				
3/28/2020	plaintiff	0.1	\$ 500.00	\$	50.00
3/30/2020	Reviewed emails	0.1	\$ 500.00	\$	50.00
	Reviewed email from				
	opposing attorney regarding				
3/30/2020	information needed	0.1	\$ 500.00	\$	50.00
	Reviewed working draft of				
	second amended complaint,				
3/30/2020	emailed edits co-counsel	0.4	\$ 500.00	\$	200.00
	Reviewed email from				
4/3/2020	opposing attorney	0.1	\$ 500.00	\$	50.00
	Downloaded defendant's				
	section of letter to court				
	regarding motion to dismiss				
	second amended complaint,				
4/3/2020	preliminarily reviewed	0.2	\$ 500.00	\$	100.00
	Reviewed and revised				
	response to defendant's				
	letter request to file motion				
4/3/2020	to dismiss	3.3	\$ 500.00	\$	1,650.00
	Requested publication of				
4/3/2020	supporting decision	0.1	\$ 500.00	\$	50.00
	Downloaded and skimmed				
	pre-motion letter regarding				
4/7/2020	possible motion to dismiss	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
4/8/2020	recorded scheduling	0.2	\$ 500.00	\$	100.00
	Conference with co-counsel				
4/13/2020	regarding tasks needed	0.2	\$ 500.00	\$	100.00
	Reviewed new scheduling,				
	spoke to co-counsel				
4/29/2020	regarding initial disclosures	0.2	\$ 500.00	\$	100.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 12 of 36 HENAO V. PARTS AUTHORITY

	Reviewed draft amended				
	initial disclosures, emailed				
4/29/2020	approval to co-counsel	0.2	\$ 500.00	\$	100.00
	Reviewed emails regarding				
	defendant's request for				
	more time to file motion to				
F /4/2020	dismiss, response to co-	0.1	¢ 500 00	<u> </u>	F0.00
5/4/2020	counsel Reviewed court order,	0.1	\$ 500.00	\$	50.00
5/5/2020	recorded new scheduling	0.1	\$ 500.00	\$	50.00
3/3/2020	Spoke to plaintiff, email to co-	0.1	7 300.00	7	30.00
5/6/2020	counsel regarding status	0.1	\$ 500.00	\$	50.00
3/ 5/ 2020	Spoke to plaintiff regarding	<u> </u>	φ 300.00	Ψ	30.00
5/6/2020	status	0.1	\$ 500.00	\$	50.00
, ,	Spoke to co-counsel			•	
	regarding opposition to				
5/14/2020	motion to dismiss	0.1	\$ 500.00	\$	50.00
	Prepared opposition to				
	motion to dismiss, drafted				
5/17/2020	personal jurisdiction section	2.9	\$ 500.00	\$	1,450.00
	Opposition to argumant				
	against standing for multi-				
5/18/2020	state claim	2.0	\$ 500.00	\$	1,000.00
	Researched opposition to				
	defendant's Twombly				
F /40/2020	arguments in support of its	1.0	¢ 500 00	.	500.00
5/18/2020	motion to compel Drafted opposition of motion	1.0	\$ 500.00	\$	500.00
	to dismiss pleading				
5/18/2020	sufficiency arguments	3.8	\$ 500.00	\$	1,900.00
3/10/2020	sameleney arguments	3.0	7 300.00	7	1,300.00
	Opposition to motion to				
	dismiss, researched response				
5/19/2020	to Twombly/Iqbal arguments	4.8	\$ 500.00	\$	2,400.00
	Opposition to motion to				
	dismiss, drafted section on				
	sufficiency of pleading				
	"single employer" and "joint				
5/20/2020	employer" relationships	1.8	\$ 500.00	\$	900.00
	Opposition to motion to				
5/21/2020	dismiss	0.8	\$ 500.00	\$	400.00
5/24/2222	Opposition to motion to	0 =	d 500 00	_	252.22
5/21/2020	dismiss	0.7	\$ 500.00	\$	350.00

	Opposition to motion to				
5/21/2020	dismiss	6.0	\$ 500.00	\$	3,000.00
3/ ==/ ===	Opposition to motion to	0.0	7 000.00	<u> </u>	3,000.00
5/22/2020	dismiss, email to co-counsel	5.2	\$ 500.00	\$	2,600.00
5/22/2020	Organized documents	0.2	\$ 500.00	\$	100.00
3/22/2020	Reviewed email from co-	0.2	7 300.00	Υ	100.00
	counsel regarding new				
	plaintiffs, response to co-				
5/26/2020	counsel	0.1	\$ 500.00	\$	50.00
3/20/2020	Email to co-counsel	0.1	7 300.00	<u> </u>	30.00
6/2/2020	regarding joint report	0.1	\$ 500.00	\$	50.00
0/2/2020	Status conference, recorded	0.1	\$ 500.00	Ų	30.00
6/9/2020	scheduling	0.4	\$ 500.00	\$	200.00
0/3/2020	Conference with co-counsel	0.4	\$ 300.00	ب	200.00
	regarding completion of				
	opposition to motion to				
6/0/2020	dismiss	0.1	¢ 500 00	Ļ	50.00
6/9/2020	Reviewed court order,	0.1	\$ 500.00	\$	50.00
6/0/2020	, and the second	0.1	\$ 500.00	Ċ	F0 00
6/9/2020	recorded scheduling Email to co-counsel	0.1	\$ 500.00	\$	50.00
c /o /2020	regarding follow-up with	0.4	¢ 500.00	<u>,</u>	50.00
6/9/2020	discovery issues	0.1	\$ 500.00	\$	50.00
	Edited, revised, and finalized				
	opposition to motion to				
0/10/0000	dismiss, emailed to co-		4		
6/10/2020	counsel for filing	6.2	\$ 500.00	\$	3,100.00
	Reviewed emails,				
- / /	downloaded opposition to				
6/11/2020	motion to dismiss	0.1	\$ 500.00	\$	50.00
	Reviewed defendant's reply				
	in support of its motion to				
	dismiss second amended				
6/24/2020	complaint	0.3	\$ 500.00	\$	150.00
	Downloaded Diligent's				
	discovery responses,				
6/26/2020	preliminarily reviewed	0.1	\$ 500.00	\$	50.00
	Email to co-counsel				
	regarding possible request				
	for hearing on motion to				
7/1/2020	dismiss	0.1	\$ 500.00	\$	50.00
	Reviewed emails regarding				
7/1/2020	process service on defendant	0.1	\$ 500.00	\$	50.00

	Email to co-counsel				
	regarding letter to court				
7/1/2020	regarding oral argument	0.1	\$ 500.00	۲	50.00
7/1/2020		0.1	\$ 500.00	\$	50.00
7/4/2020	Email to opposing attorney	0.4	¢ 500.00	<u> </u>	F0.00
7/1/2020	regarding oral argument	0.1	\$ 500.00	\$	50.00
	Revised discovery dispute				
	email, email to co-counsel				
1-1	regarding addressing				
7/6/2020	discovery disputes	0.3	\$ 500.00	\$	150.00
	Drafted template				
	interroggatory responses and				
	objections, email to co-				
7/6/2020	counsel	1.0	\$ 500.00	\$	500.00
	Incorporated co-counsel's				
	edits into template discovery				
7/6/2020	responses	0.2	\$ 500.00	\$	100.00
	Worked with plaintiffs on				
7/6/2020	discovery responses	3.8	\$ 500.00	\$	1,900.00
	Downloaded defendant's				
	documents for discovery,				
	reviewed email from co-				
	counsel regarding				
7/7/2020	documents received	0.2	\$ 500.00	\$	100.00
7/7/2020	Spoke to plaintiff	0.2	\$ 500.00	\$	100.00
7/8/2020	Called plaintiff again	0.1	\$ 500.00	\$	50.00
	Spoke to plaintiff, prepared				
7/8/2020	discovery responses	0.5	\$ 500.00	\$	250.00
	Reviewed email/questions				
	from defense counsel,				
	prepared draft responses,				
7/10/2020	email to co-counsel	0.4	\$ 500.00	\$	200.00
·					
	Reviewed email from				
	opposing attorney regarding				
	discovery disputes, reviewed				
7/13/2020	co-counsels response email	0.2	\$ 500.00	\$	100.00
, ==, ====	Follow-up efforts on	Ţ. <u>⊒</u>	, , , , , , ,		
	discovery disputes, email to				
7/14/2020	co-counsel	0.2	\$ 500.00	\$	100.00
., 1., 2020	Reviewed discovery dispute	J	+ 300.00	7	130.00
7/15/2020	emails	0.1	\$ 500.00	\$	50.00
771372020	Citions	0.1	7 300.00	Y	30.00

	Downloaded Parts				
	Authority's discovery				
7/45/2020	,	0.1	¢ 500 00	<u>,</u>	FO 00
7/15/2020	responses Reviewed email regarding	0.1	\$ 500.00	\$	50.00
7/46/2020	meet and confer call,	0.4	4 500 00		50.00
7/16/2020	response to co-counsel	0.1	\$ 500.00	\$	50.00
	Follow-up calls and emails				
7/46/2020	regarding discovery	0.4	¢ 500 00	<u> </u>	200.00
7/16/2020	responses	0.4	\$ 500.00	\$	200.00
7/16/2020	Organized documents	0.1	\$ 500.00	\$	50.00
	Follow-up calls and text				
	messages to plaintiffs				
7/47/2020	regarding discovery		4		150.00
7/17/2020	responses	0.3	\$ 500.00	\$	150.00
-11	Strategy conference with co-		4		
7/17/2020	counsel	0.5	\$ 500.00	\$	250.00
	Discovery dispute email to				
= // 0 /000	opposing attorney, email to		4	_	
7/18/2020	co-counsel	1.2	\$ 500.00	\$	600.00
	Follow-up calls to plaintiff				
= /a a /a a a	regarding discovery		4		
7/20/2020	response, drafted notes	0.3	\$ 500.00	\$	150.00
	Called plaintiff again				
= /o.o./o.o.o.	regarding discovery		4	_	
7/20/2020	responses	0.3	\$ 500.00	\$	150.00
	Reviewed email, checked				
	schedule, email to co-				
	counsel regarding scheduling				
7/21/2020	discovery dispute conference	0.1	\$ 500.00	\$	50.00
	Attempted to reach plaintiff				
	regarding discovery				
	responses, emailed working				
,,,	drafts with instructions to co-	_	4	,	
7/21/2020	counsel	0.4	\$ 500.00	\$	200.00
	Revised and sent discovery				
	follow-up email to opposing		4	,	
7/22/2020	attorney	0.1	\$ 500.00	\$	50.00
	Compiled contact				
	information, email to co-				
7/22/2020	counsel	0.2	\$ 500.00	\$	100.00

	1 5 16 1				
	Prepared for discovery				
	dispute conference, drafted				
7/26/2020	notes for discussion	0.4	\$ 500.00	\$	200.00
	Prepared for discovery				
	dispute call, discovery				
	dispute call, drafted notes,				
7/27/2020	follow-up emails	2.0	\$ 500.00	\$	1,000.00
	Downloaded and checked				
	draft discovery responses,				
7/27/2020	email to co-counsel	0.4	\$ 500.00	\$	200.00
	Drafted request for				
	production responses, email				
7/27/2020	to co-counsel	0.4	\$ 500.00	\$	200.00
	Helped co-counsel organize				
	and produce discovery				
7/27/2020	responses and production	0.3	\$ 500.00	\$	150.00
	Reviewed and edited				
7/27/2020	discovery responses	0.3	\$ 500.00	\$	150.00
	Downloaded final responses				
	to discovery and document				
7/28/2020	production	0.1	\$ 500.00	\$	50.00
	Reviewed Williams' text				
7/28/2020	message, email to co-counsel	0.3	\$ 500.00	\$	150.00
	Reviewed ethics of recording				
	discovery dispute call, email				
7/29/2020	to co-counsel	0.3	\$ 500.00	\$	150.00
	Discovery dispute call,				
7/29/2020	drafted notes	1.3	\$ 500.00	\$	650.00
	Downloaded audio				
7/29/2020	recording, tested recording	0.1	\$ 500.00	\$	50.00
	Reviewed email regarding				
8/6/2020	discovery issues	0.1	\$ 500.00	\$	50.00
	Reviewed email from				
	opposing attorney, email to				
	co-counsel regarding				
	cancelling meet and confer				
8/6/2020	call	0.1	\$ 500.00	\$	50.00
	Reviewed magistrate's draft				
	protective order, edited				
8/6/2020	document	0.4	\$ 500.00	\$	200.00
				_	

	Conference with co-counsel				
	regarding draft protective				
8/7/2020	order language	0.2	\$ 500.00	\$	100.00
8/7/2020	Reviewed discovery dispute	0.2	\$ 500.00	۲	100.00
8/11/2020	emails	0.1	\$ 500.00	\$	50.00
8/11/2020	Reviewed email regarding	0.1	\$ 300.00	۲	30.00
	discovery status, response to				
8/12/2020	co-counsel	0.1	\$ 500.00	\$	50.00
0/12/2020	Spoke to named plaintiff	0.1	7 300.00	Ţ	30.00
8/13/2020	regarding status	0.1	\$ 500.00	\$	50.00
0/13/2020	Reviewed and revised	0.1	7 300.00	7	30.00
8/13/2020	discovery requests	2.0	\$ 500.00	\$	1,000.00
0/13/2020	discovery requests	2.0	7 300.00	7	1,000.00
	Reviewed discovery requests,				
8/14/2020	email to co-counsel	0.3	\$ 500.00	\$	150.00
0/14/2020	Reviewed draft pre-motion	0.5	7 300.00	7	130.00
	letter regarding discovery				
	issues, researched and				
	supplemented pre-motion				
8/14/2020	letter	1.8	\$ 500.00	\$	900.00
9/2://2020	Reviewed edits to pre-		7 555.55	Τ	200.00
	motion letter, email to co-				
8/14/2020	counsel	0.2	\$ 500.00	\$	100.00
3/ = 1/ = 3 = 3	Reviewed defendant's	<u> </u>	7 00000	т	
	response to pre-motion to				
8/28/2020	compel letter	0.1	\$ 500.00	\$	50.00
, ,	·		,		
	Reviewed court order,				
	recorded scheduling, email				
	to co-counsel covering oral				
9/1/2020	argument on discovery issues	0.1	\$ 500.00	\$	50.00
	Downloaded discovery				
9/4/2020	requests	0.1	\$ 500.00	\$	50.00
9/10/2020	Reviewed discovery order	0.2	\$ 500.00	\$	100.00
	Called and emailed				
	Department of Labor				
9/21/2020	attorney	0.2	\$ 500.00	\$	100.00
	Strategy conference with co-				
9/23/2020	counsel	0.2	\$ 500.00	\$	100.00
	Reviewed court order,				
9/25/2020	recorded scheduling	0.3	\$ 500.00	\$	150.00

	Reviewed email regarding				
	motion to dismiss decision,				
	email to co-counsel				
9/25/2020	regarding ideas to cure	0.2	\$ 500.00	\$	100.00
9/23/2020	Reviewed email from co-	0.2	\$ 300.00	Ą	100.00
	counsel regarding				
0/27/2020	strategy/support for second	0.1	¢ 500 00	۲.	F0.00
9/27/2020	amended complaint	0.1	\$ 500.00	\$	50.00
	Downloaded and				
	preliminarily reviewed				
0 /00 /000	documents from Department		4 = 00 00		100.00
9/28/2020	of Labor Arizona case	0.2	\$ 500.00	\$	100.00
	Collected data to use in				
2 /2 2 /2 2 2	letter requesting				
9/30/2020	amendment of complaint	0.8	\$ 500.00	\$	400.00
	Reviewed email, response to				
	co-counsel regarding new				
10/3/2020	pleading	0.1	\$ 500.00	\$	50.00
	Reviewed and revised letter				
10/12/2020	regarding leave to amend	1.0	\$ 500.00	\$	500.00
	Revised letter to magistrate				
	and third amended				
	complaint, email to co-				
10/14/2020	counsel	4.8	\$ 500.00	\$	2,400.00
	Reviewed draft third				
10/15/2020	amended complaint	0.4	\$ 500.00	\$	200.00
	Reviewed and revised third				
	amended complaint and				
	letter to court, email to co-				
10/15/2020	counsel	0.8	\$ 500.00	\$	400.00
	Explained calculations to co-				
10/15/2020	counsel	0.3	\$ 500.00	\$	150.00
	Reviewed co-counsel's edits				
	to letter to court, email to co-				
10/15/2020	counsel	0.3	\$ 500.00	\$	150.00
	Reviewed new section of				
	complaint, email to co-				
10/16/2020	counsel	0.1	\$ 500.00	\$	50.00
	Efforts to check numbers for				
	letter to court and third				
10/16/2020	amended complaint	0.3	\$ 500.00	\$	150.00
, ,					

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 19 of 36 HENAO V. PARTS AUTHORITY

Poviowed emails and				
	0.2	\$ 500.00	Ś	100.00
,		7 000.00	т	
·	0.1	\$ 500.00	ς .	50.00
S	0.1	7 300.00	7	30.00
	0.1	\$ 500.00	Ċ	50.00
,	0.1	\$ 300.00	Ą	30.00
• *				
J,	0.2	¢ 500 00	<u> </u>	100.00
	0.2	\$ 500.00	\$	100.00
· · · · · · · · · · · · · · · · · · ·		4		
·	0.1	\$ 500.00	\$	50.00
· ·				
	0.1	\$ 500.00	\$	50.00
	0.4	\$ 500.00	\$	200.00
Drafted request for				
production regarding				
affirmative defenses, email				
to co-counsel	0.5	\$ 500.00	\$	250.00
Conference with department of labor attorney, email to co-counsel, follow-up email to				
·	0.6	\$ 500.00	\$	300.00
Reviewed email from co- counsel, emailed response to co-counsel regarding scope of claim	0.1	\$ 500.00	\$	50.00
Reviewed and revised draft				
response to defense counsel	0.2	\$ 500.00	\$	100.00
Downloaded discovery				
requests	0.1	\$ 500.00	\$	50.00
Downloaded discovery				
requests	0.1	\$ 500.00	\$	50.00
Reviewed defendant's letter				
requesting to file motion to				
dismiss third amended				
complaint	0.2	\$ 500.00	\$	100.00
Reviewed court order,				
recorded scheduling	0.1	\$ 500.00	\$	50.00
	affirmative defenses, email to co-counsel Conference with department of labor attorney, email to co-counsel, follow-up email to department of labor Reviewed email from co-counsel, emailed response to co-counsel regarding scope of claim Reviewed and revised draft response to defense counsel Downloaded discovery requests Downloaded discovery requests Reviewed defendant's letter requesting to file motion to dismiss third amended complaint Reviewed court order,	Reviewed court order, recorded scheduling 0.1 Reviewed email from opposing attorney 0.1 Downloaded defendant's discovery, recorded scheduling, email to cocounsel 0.2 Emails regarding conference regarding discovery follow-up and responses 0.1 Discussed process service issues with co-counsel conference with co-counsel regarding discovery issues 0.4 Drafted request for production regarding affirmative defenses, email to co-counsel, follow-up email to department of labor attorney, email to cocounsel, follow-up email to department of labor 0.6 Reviewed email from cocounsel regarding scope of claim 0.1 Reviewed and revised draft response to defense counsel 0.2 Downloaded discovery requests 0.1 Reviewed defendant's letter requesting to file motion to dismiss third amended complaint 0.2 Reviewed court order,	plaintiff's text messages Reviewed court order, recorded scheduling Reviewed email from opposing attorney Downloaded defendant's discovery, recorded scheduling, email to co- counsel Emails regarding conference regarding discovery follow- up and responses Discussed process service issues with co-counsel regarding discovery issues Drafted request for production regarding affirmative defenses, email to co-counsel, follow-up email to department of labor Reviewed email from co- counsel, emailed response to co-counsel, emailed response to co-counsel defense counsel Downloaded discovery requests Downloaded discovery requests Downloaded discovery requests Downloaded discovery requests Reviewed defendant's letter requesting to file motion to dismiss third amended complaint O.2 \$ 500.00	Plaintiff's text messages Reviewed court order, recorded scheduling Reviewed email from opposing attorney Ondinaded defendant's discovery, recorded scheduling, email to cocounsel Counsel Discussed process service issues with co-counsel regarding discovery issues Drafted request for production regarding affirmative defenses, email to co-counsel, follow-up email to department of labor attorney, email to cocounsel, emailed response to co-counsel regarding scope of claim Reviewed and revised draft response to defense counsel Downloaded discovery requests Downloaded discovery requests Reviewed defendant's letter requesting to file motion to dismiss third amended complaint Reviewed court order, Reviewed court order,

	Reviewed emails regarding			
	opposition to motion to			
	dismiss, response to co-			
12/1/2020	counsel	0.1	\$ 500.00	\$ 50.00
	Opposition to pre-motion			
	letter requesting leave to file			
	motion to dismiss third			
12/1/2020	amended complaint	3.0	\$ 500.00	\$ 1,500.00
	Researched and drafted			
	response to pre-motion			
	letter motion to dismiss third			
12/1/2020	amended complaint	3.2	\$ 500.00	\$ 1,600.00
	Reviewed emails, recorded			
12/2/2020	scheduling	0.1	\$ 500.00	\$ 50.00
	Reviewed emails and co-			
	counsel's edits to response			
	to pre-motion letter,			
	researched additional			
12/3/2020	arguments	0.8	\$ 500.00	\$ 400.00
	Reviewed emails regarding		•	
	opposition to pre-motion			
12/4/2020	letter	0.2	\$ 500.00	\$ 100.00
	Strategy conference with co-			
12/4/2020	counsel	0.3	\$ 500.00	\$ 150.00
	Reviewed defendant's draft			
12/4/2020	status letter to court	0.1	\$ 500.00	\$ 50.00
	Reviewed court order,			
12/5/2020	recorded scheduling	0.1	\$ 500.00	\$ 50.00
	Reviewed draft letter report			
12/7/2020	to court, email to co-counsel	0.1	\$ 500.00	\$ 50.00
	Downloaded Parts			
	Authority's supplemental			
	discovery responses and			
	document production, email			
12/8/2020	to opposing attorney	0.2	\$ 500.00	\$ 100.00
12/8/2020	Reviewed court order	0.1	\$ 500.00	\$ 50.00
	Prepared for motion to stay			
12/8/2020	argument	1.2	\$ 500.00	\$ 600.00
	Prepared for discovery			
12/8/2020	dispute call	0.2	\$ 500.00	\$ 100.00

	Prepared for discovery				
	dispute conference,				
	•				
42/0/2020	discovery dispute	4.2	¢ 500 00	<u> </u>	650.00
12/8/2020	conference, drafted notes	1.3	\$ 500.00	\$	650.00
42/0/2020	Prepare for motion to stay	0.6	d 500 00		200.00
12/9/2020	argument	0.6	\$ 500.00	\$	300.00
12/9/2020	Motion to stay argument	0.8	\$ 500.00	\$	400.00
	Reviewed template discovery				
12/10/2020	objections	0.1	\$ 500.00	\$	50.00
	Reviewed and revised				
12/10/2020	template objections	0.7	\$ 500.00	\$	350.00
	Reviewed emails,				
	downloaded deposition				
12/11/2020	notices	0.1	\$ 500.00	\$	50.00
	Downloaded motion to				
	dismiss third amended				
12/21/2020	complaint	0.1	\$ 500.00	\$	50.00
	Reviewed defendant's				
	motion to dismiss argument				
	on process service,				
	researched issue and				
12/22/2020	possible responses	0.9	\$ 500.00	\$	450.00
	Emails to co-counsel				
12/22/2020	regarding process service	0.1	\$ 500.00	\$	50.00
	Drafted argument regarding				
12/22/2020	process service	0.4	\$ 500.00	\$	200.00
	Opposition to motion to				
	dismiss third amended				
12/22/2020	complaint	1.2	\$ 500.00	\$	600.00
	Opposition to motion to				
	dismiss third amended				
12/23/2020	complaint	0.2	\$ 500.00	\$	100.00
, ,	Emails with co-counsel			•	
	regarding opposition to				
12/23/2020	motion to dismiss	0.1	\$ 500.00	\$	50.00
==,==,====	Opposition to motion to	<u> </u>	Ψ σσσισσ	т	55.55
	dismiss third amended				
12/24/2020	complaint	3.9	\$ 500.00	\$	1,950.00
12,21,2020	Opposition to motion to	0.5	7 555.55	Ψ	2,000.00
	dismiss third amended				
	complaint, email to co-				
12/25/2020	counsel	3.7	\$ 500.00	\$	1,850.00
12/23/2020	Courisei	5.7	\$ 500.00	Ą	1,000.00

	Reviewed emails regarding				
12/30/2020	discovery issues	0.1	\$ 500.00	\$	50.00
, , , , , ,	Reviewed questions		,	•	
	regarding service, response				
12/30/2020	to co-counsel's office	0.1	\$ 500.00	\$	50.00
	Conference with co-counsel		7 232.23	7	
1/4/2021	regarding tasks needed	0.2	\$ 500.00	\$	100.00
	Conference with co-counsel		7 000.00	7	
	regarding deposition				
1/4/2021	preparation	0.2	\$ 500.00	\$	100.00
	Conference with co-counsel	<u> </u>	7 555.55	т	
	regarding mediation				
1/4/2021	availability	0.1	\$ 500.00	\$	50.00
	Reviewed email from	0.12	7 555.55	τ	30.00
	opposing attorney regarding				
1/6/2021	discovery disputes	0.1	\$ 500.00	\$	50.00
_, 0, _0	Reviewed mediation dates,	<u> </u>	7 555.55	7	55.55
1/6/2021	response to co-counsel	0.1	\$ 500.00	\$	50.00
_, _,	Reviewed email regarding		7 000.00	7	
1/7/2021	deposition scheduling	0.1	\$ 500.00	\$	50.00
, , -	Downloaded and reviewed		,	•	
1/9/2021	request for extension	0.1	\$ 500.00	\$	50.00
	Reviewed email, downloaded				
1/9/2021	deposition notices	0.1	\$ 500.00	\$	50.00
	Reviewed emails regarding				
	method of service, response				
1/12/2021	to co-counsel	0.2	\$ 500.00	\$	100.00
	Conference with co-counsel				
1/12/2021	regarding mediation strategy	0.1	\$ 500.00	\$	50.00
	Assisted co-counsel with				
1/14/2021	deposition preparation	0.2	\$ 500.00	\$	100.00
	Reviewed forms from				
1/21/2021	mediation service	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
1/21/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Spoke to co-counsel				
	regarding preparation for				
1/21/2021	mediation	0.2	\$ 500.00	\$	100.00
	Reviewed emails regarding		4		
1/27/2021	mediation preparation	0.1	\$ 500.00	\$	50.00

	Reviewed co-counsel's outline of mediation brief,				
1/27/2021	response to co-counsel	0.1	\$ 500.00	\$	50.00
	De la colonal constant				
	Reviewed email, response to				
4 /27 /2024	co-counsel regarding tasks	0.4	Å 500.00		50.00
1/27/2021	needed for mediation brief	0.1	\$ 500.00	\$	50.00
	Drafted section of mediation				
	brief on defendant's inability				
	to compel arbitration under				
1/27/2021	Ritmann v. Amazon	0.9	\$ 500.00	\$	450.00
1/27/2021	Located source of evidence,	0.9	\$ 500.00	Ą	450.00
1/28/2021	email to co-counsel	0.2	\$ 500.00	\$	100.00
1/20/2021	Emails with co-counsel	0.2	\$ 300.00	٦	100.00
	regarding mediation brief				
1/28/2021	content	0.2	\$ 500.00	\$	100.00
1/20/2021	Response to co-counsel	0.2	7 300.00	٧	100.00
1/28/2021	regarding mediation brief	0.1	\$ 500.00	\$	50.00
1/28/2021	Conference with co-counsel	0.2	\$ 500.00	\$	100.00
1/20/2021	Reviewed and revised	0.2	7 300.00	7	100.00
1/28/2021	mediation brief	0.9	\$ 500.00	\$	450.00
, -, -	Reviewed email, response		,		
2/1/2021	regarding call with mediator	0.1	\$ 500.00	\$	50.00
2/1/2021	Conference with mediator	0.2	\$ 500.00	\$	100.00
	Signed mediation contract,				
2/1/2021	email to co-counsel	0.1	\$ 500.00	\$	50.00
2/2/2021	Prepared for mediation	0.2	\$ 500.00	\$	100.00
2/2/2021	Mediation	8.1	\$ 500.00	\$	4,050.00
	Reviewed draft status letter				
2/4/2021	to court, email to co-counsel	0.1	\$ 500.00	\$	50.00
	Conference with co-counsel				
	regarding responses to				
2/4/2021	settlement offer	0.7	\$ 500.00	\$	350.00
	Gathered data for further				
2/4/2021	negotiations	2.2	\$ 500.00	\$	1,100.00
	Conference with court				
	regarding status and				
	discovery issues, drafted				
2/8/2021	notes	0.4	\$ 500.00	\$	200.00
2/8/2021	Looked into discovery issues	0.2	\$ 500.00	\$	100.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 24 of 36 HENAO V. PARTS AUTHORITY

	Reviewed prior discovery				
	responses, email to co-				
	counsel regarding				
2/8/2021	supplementation needed	0.2	\$ 500.00	\$	100.00
2/0/2021	Reviewed and edited	0.2	φ 300.00	7	100.00
	opposition to motion to				
2/15/2021	dismiss third amended claim	1.1	\$ 500.00	\$	550.00
2/15/2021	Downloaded and reviewed	1.1	7 300.00	7	330.00
2/16/2021	filings	0.2	\$ 500.00	\$	100.00
2/16/2021	Conference with co-counsel	0.1	\$ 500.00	\$	50.00
2/17/2021	Reviewed settlement emails	0.1	\$ 500.00	\$	50.00
2/17/2021	Reviewed email, checked	0.1	7 300.00	7	30.00
	prior notes, emailed				
	information regarding				
	possible class member to co-				
2/19/2021	counsel	0.2	\$ 500.00	\$	100.00
2/15/2021	Reviewed request for	0.2	7 300.00	7	100.00
2/19/2021	extension	0.1	\$ 500.00	\$	50.00
2/15/2021	Reviewed reply in support of	0.1	7 300.00	7	30.00
2/23/2021	motion to dismiss	0.2	\$ 500.00	\$	100.00
2/25/2021	motion to dismiss	0.2	7 300.00	7	100.00
	Reviewed email, response to				
	co-counsel regarding				
	discovery of tax returns,				
3/4/2021	researched further authority	0.4	\$ 500.00	\$	200.00
3/4/2021	Reviewed court order,	0.4	7 300.00	7	200.00
3/4/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
3/4/2021	Reviewed court order,	0.1	7 300.00	7	30.00
4/5/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
1/3/2021	Reviewed court order,	0.1	φ 300.00	7	30.00
4/6/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
., 0, 2021		0.12	Ψ 300.00	Ψ	30.00
	Conference with co-counsel				
	regarding personal				
4/9/2021	jurisdiction discovery needed	0.2	\$ 500.00	\$	100.00
., 3, 2021	Reviewed deposition	0.2	φ 500.00	Ψ	100.00
	transcript to plan personal				
4/9/2021	jurisdiction discovery	0.5	\$ 500.00	\$	250.00
., 5, 2021	Reviewed deposition	0.0	7 330.00	Υ	230.00
	transcript to plan personal				
4/9/2021	jurisdiction discovery	0.2	\$ 500.00	\$	100.00
1, 5, 2021	Researched connection	0.2	7 300.00	7	100.00
4/9/2021	between Diligent entities	1.0	\$ 500.00	\$	500.00
7/3/2021	Setween Dingent chities	1.0	7 300.00	7	500.00

	Reviewed deposition				
	transcript to prepare for				
	personal jurisdiction				
4/0/2021	discovery	1.4	\$ 500.00	\$	700.00
4/9/2021	Researched factual bases for	1.4	\$ 500.00	Ş	700.00
	personal jurisdiction over				
	Larry Browne, compiled				
4/44/2024	evidence, email to co-	2.4	¢ 500.00		4 700 00
4/11/2021	counsel	3.4	\$ 500.00	\$	1,700.00
	Reviewed email and				
	proposed order on				
4/12/2021	jurisdictional discovery	0.1	\$ 500.00	\$	50.00
	Reviewed email regarding				
4/12/2021	jurisdictional discovery	0.1	\$ 500.00	\$	50.00
	Reviewed proposed				
4/12/2021	scheduling plan	0.1	\$ 500.00	\$	50.00
	Strategy conference with co-				
4/13/2021	counsel	0.2	\$ 500.00	\$	100.00
	Reviewed, edited, and				
	supplemented discovery				
4/13/2021	request /deposition notice	0.6	\$ 500.00	\$	300.00
	Worked with co-counsel on				
	jurisdictional discovery				
4/13/2021	requests	0.1	\$ 500.00	\$	50.00
	Reviewed and edited				
4/13/2021	discovery requests	0.3	\$ 500.00	\$	150.00
	Downloaded plaintiffs				
	jurisdictional discovery				
4/14/2021	requests	0.1	\$ 500.00	\$	50.00
	Reviewed court order				
	regarding jurisdictional				
	discovery, recorded				
4/14/2021	scheduling	0.1	\$ 500.00	\$	50.00
	Emailed ideas to co-counsel				
	regarding limiting				
4/20/2021	jurisdictional discovery	0.6	\$ 500.00	\$	300.00
	Reviewed draft status letter				
4/20/2021	to magistrate	0.1	\$ 500.00	\$	50.00
	Preliminarily reviewed				
	defendant's discovery				
4/21/2021	dispute email	0.1	\$ 500.00	\$	50.00

	I			
	Reviewed email regarding			
	discovery disputes,			
	suggested response to co-			
4/21/2021	counsel	0.2	\$ 500.00	\$ 100.00
	Reviewed emails regarding			
	scope of jurisdictional			
4/22/2021	discovery	0.1	\$ 500.00	\$ 50.00
	Reviewed emails regarding			
4/22/2021	discovery issues/deadlines	0.1	\$ 500.00	\$ 50.00
	Reviewed email from			
	opposing attorney regarding			
	jurisdictional discovery			
4/23/2021	disputes	0.1	\$ 500.00	\$ 50.00
	Downloaded defendant's			
	letter brief regarding			
	jurisdictional discovery,			
4/23/2021	preliminarily reviewed it	0.1	\$ 500.00	\$ 50.00
	Reviewed discovery issues			
	with co-counsel, planned			
	response to letter motion on			
4/23/2021	discovery scope	0.3	\$ 500.00	\$ 150.00
	Edited discovery compromise			
	email, forwarded to co-			
4/23/2021	counsel	0.2	\$ 500.00	\$ 100.00
	Researched and drafted			
	opposition to defendant's			
	letter motion seeking to			
4/24/2021	narrow scope of discovery	1.5	\$ 500.00	\$ 750.00
	Researched and drafted			
	opposition to defendant's			
	letter motion seeking to			
	narrow scope of			
	jurisdictional discovery,			
4/24/2021	email to co-counsel	0.9	\$ 500.00	\$ 450.00
	Reviewed court order,			
4/25/2021	recorded scheduling	0.1	\$ 500.00	\$ 50.00
	Reviewed co-counsel's			
	response to opposition letter			
	brief on scope of			
	jurisdictional discovery,			
4/26/2021	reviewed co-counsel's edits	0.2	\$ 500.00	\$ 100.00

	Reviewed email from			
4/07/0004	opposing attorney, updated		4 = 00 00	222.22
4/27/2021	draft opposition to letter	0.4	\$ 500.00	\$ 200.00
	Finalized and electronically			
	filed response to defendant's			
	letter regarding scope of			
4/27/2021	jurisdictional discovery	0.4	\$ 500.00	\$ 200.00
	Prepared for discovery			
4/27/2021	dispute hearing	0.3	\$ 500.00	\$ 150.00
	Prepared for discovery			
4/28/2021	dispute hearing	1.0	\$ 500.00	\$ 500.00
	Discovery dispute hearing,			
4/28/2021	drafted notes	1.6	\$ 500.00	\$ 800.00
4/28/2021	Conference with co-counsel	0.1	\$ 500.00	\$ 50.00
	Reviewed court order on			
	scope of jurisdictional			
4/29/2021	discovery	0.1	\$ 500.00	\$ 50.00
	Downloaded and			
	preliminarily reviewed			
	defendant's request for			
	production responses and			
5/3/2021	documents	0.2	\$ 500.00	\$ 100.00
	Organized documents for			
5/4/2021	R30(b)(6) deposition	0.1	\$ 500.00	\$ 50.00
	Reviewed defendant's			
	request for proposal			
	responses and document			
	production, compared to			
5/4/2021	court order, drafted notes	0.3	\$ 500.00	\$ 150.00
	Prepared new R30(b)(6)			
	deposition notice, email to			
5/4/2021	co-counsel	0.3	\$ 500.00	\$ 150.00
	Conference with co-counsel			
	regarding discovery			
5/4/2021	responses and tasks needed	0.2	\$ 500.00	\$ 100.00
	Reviewed email from			
	defense attorney regarding			
	R30(b)(6) topics and time			
	length, response to opposing			
5/4/2021	attorney	0.1	\$ 500.00	\$ 50.00

Reviewed email response to				
•				
	0.1	\$ 500 00	\$	50.00
	0.1	7 300.00	7	30.00
·	0.2	\$ 500.00	¢	100.00
•	0.2	7 300.00	7	100.00
	0.1	\$ 500.00	\$	50.00
•		7 00000	т	
·				
_	1.5	\$ 500.00	\$	750.00
		7 000.00	т	, 50.00
supporting single employer				
	0.8	\$ 500.00	\$	400.00
	0.0	7 000.00	7	
·				
•				
Circuit	2.2	\$ 500.00	\$	1,100.00
Reviewed opposing		7 000.00	т	_,
· · · · ·				
,				
. , , , ,				
•				
·				
•	0.3	\$ 500.00	\$	150.00
Reviewed defendant's		•	•	
discovery responses	0.1	\$ 500.00	\$	50.00
deponent's identity	0.1	\$ 500.00	\$	50.00
Downloaded deposition			-	
exhibits	0.1	\$ 500.00	\$	50.00
Prepared for R30(b)(6)				
deposition on personal				
jurisdiction issues	2.2	\$ 500.00	\$	1,100.00
Email to co-counsel				
regarding deposition				
preparation and ideas	0.1	\$ 500.00	\$	50.00
Prepared for jurisdictional				
discovery R30(b)(6)				
deposition	1.0	\$ 500.00	\$	500.00
	Reviewed opposing attorney's email regarding scope of R30(b)(6) deposition, reviewed court order and prior deposition notice, email response to opposing attorney Reviewed defendant's discovery responses Follow-up email to opposing attorney regarding deponent's identity Downloaded deposition exhibits Prepared for R30(b)(6) deposition on personal jurisdiction issues Email to co-counsel regarding deposition preparation and ideas Prepared for jurisdictional discovery R30(b)(6)	popposing attorney regarding deposition scheduling Finalized and reviewed deposition notice, email to court reporter Downloaded and shared Zoom link for deposition Researched corporate connections among defendants Drafted table of evidence supporting single employer status Researched personal jurisdiction based on single employer status in Second Circuit Reviewed opposing attorney's email regarding scope of R30(b)(6) deposition, reviewed court order and prior deposition notice, email response to opposing attorney email to opposing attorney regarding deponent's identity Downloaded deposition exhibits Prepared for R30(b)(6) deposition on personal jurisdiction issues Email to co-counsel regarding deposition preparation and ideas Prepared for jurisdictional discovery R30(b)(6)	deposition scheduling Finalized and reviewed deposition notice, email to	deposition scheduling deposition notice, email to court reporter Downloaded and shared Zoom link for deposition Researched corporate connections among defendants Drafted table of evidence supporting single employer status Researched personal jurisdiction based on single employer status in Second Circuit Reviewed opposing attorney's email regarding scope of R30(b)(6) deposition, reviewed court order and prior deposition notice, email response to opposing attorney Reviewed defendant's discovery responses Follow-up email to opposing attorney regarding deponent's identity Downloaded deposition exhibits Prepared for R30(b)(6) deposition on personal jurisdiction issues Email to co-counsel regarding deposition preparation and ideas Prepared for jurisdictional discovery R30(b)(6)

	Began supplemental brief on				
5/12/2021	personal jurisdiction	1.6	\$ 500.00	\$	800.00
	Prepared for R30(b)(6)				
5/13/2021	deposition	0.5	\$ 500.00	\$	250.00
	Reviewed and incorporated			-	
	co-counsel's additions to				
5/13/2021	R30(b)(6) outline	0.2	\$ 500.00	\$	100.00
	Identified and compiled				
	exhibits to serve on opposing				
5/13/2021	attorney	0.5	\$ 500.00	\$	250.00
5/13/2021	Emails with court reporter	0.1	\$ 500.00	\$	50.00
	Prepared for R30(b)(6)				
5/13/2021	deposition	0.9	\$ 500.00	\$	450.00
	Prepared for R30(b)(6)				
5/14/2021	deposition	0.7	\$ 500.00	\$	350.00
	Prepared for R30(b)(6)				
5/14/2021	deposition	1.7	\$ 500.00	\$	850.00
	Supplemented brief on				
5/14/2021	personal jurisdiction	0.8	\$ 500.00	\$	400.00
	Supplemented brief on				
5/15/2021	personal jurisdiction	0.8	\$ 500.00	\$	400.00
	Downloaded deposition				
5/16/2021	transcript and exhibits	0.1	\$ 500.00	\$	50.00
	Reviewed R30(b)(6)				
	deposition, drafted notes,				
	supplemented breief on				
	personal jurisdiction from				
5/16/2021	depo testimony	2.8	\$ 500.00	\$	1,400.00
	Revised and enhanced				
	supplemental brief on				
5/17/2021	personal jurisdiction	1.0	\$ 500.00	\$	500.00
	Reviewed co-counsel's edits				
	to supplemental brief on				
	personal jurisdiction,				
- 10 0 15 5 5	reviewed evidence of		4		
5/20/2021	frequency of contacts	0.4	\$ 500.00	\$	200.00
F /20 /2024	Researched new argument	0.6	¢ 500 00	4	202.22
5/20/2021	for supplemental brief	0.6	\$ 500.00	\$	300.00
	Reviewed, revised, and				
	finalized supplemental brief,				
F /20 /2024	compiled and referenced	2.0	¢ 500 00	۲	1 000 00
5/20/2021	exhibits	2.0	\$ 500.00	\$	1,000.00

	Finalized supplemental brief,				
5/20/2021	prepared exhibits	1.0	\$ 500.00	\$	500.00
	Finalized exhibits, electronic				
5/21/2021	case filing	0.8	\$ 500.00	\$	400.00
. ,	Reviewed deponent's errata			•	
5/27/2021	sheet	0.1	\$ 500.00	\$	50.00
	Reviewed defendant's				
5/28/2021	supplemental brief	0.2	\$ 500.00	\$	100.00
	Reviewed email, preliminarily				
	reviewed draft discovery				
6/30/2021	responses	0.1	\$ 500.00	\$	50.00
	Reviewed ruling on motion				
7/2/2021	to dismiss	0.2	\$ 500.00	\$	100.00
	Reviewed emails regarding				
7/2/2021	brainstorming/strategy	0.1	\$ 500.00	\$	50.00
	Reviewed discovery dispute				
	letter regarding R30(b)(6)				
	deposition, email to co-				
7/6/2021	counsel	0.1	\$ 500.00	\$	50.00
	Reviewed email regarding				
	meet and confer				
	issues/R30(b)(6) witness				
7/9/2021	preparation	0.1	\$ 500.00	\$	50.00
	Reviewed deposition notice,				
	planned for deposition, email				
7/10/2021	to co-counsel	0.2	\$ 500.00	\$	100.00
	Conference with co-counsel				
	regarding discovery				
	responses and deposition				
7/12/2021	scheduling/coverage	0.2	\$ 500.00	\$	100.00
-1.21	Reviewed email regarding		4	_	
7/12/2021	deponents' availability	0.1	\$ 500.00	\$	50.00
	Reviewed email, response to				
7/10/2021	co-counsel regarding meet	0.4	d 500 55	٠	
7/13/2021	and confer efforts	0.1	\$ 500.00	\$	50.00
	Preliminarily researched				
7/20/2024	Parts Authority's request for	0.2	¢ 500 00	,	450.00
7/20/2021	separate depositions	0.3	\$ 500.00	\$	150.00
	Conference with co-counsel				
	regarding deposition				
7/20/2024	scheduling/defendant's	0.2	¢ 500 00	۲	150.00
7/20/2021	requests	0.3	\$ 500.00	\$	150.00

	Reviewed impact of Arizona				
	motion to dismiss order,				
	drafted summary				
7/24/2024	impact/recommendations	4.0	ć 500 00	<u> </u>	500.00
7/21/2021	memo/email	1.0	\$ 500.00	\$	500.00
	Davisonad os samaslla natas				
7/20/2024	Reviewed co-counsel's notes,	0.4	d 500 00		50.00
7/20/2021	response to co-counsel	0.1	\$ 500.00	\$	50.00
	Davisous disposite also des d				
	Reviewed emails, checked				
7/22/224	need for interpreter,		4 = 00 00		50.00
7/22/2021	response to defense counsel	0.1	\$ 500.00	\$	50.00
7/22/2224	Reviewed emails regarding		4 = 00 00		50.00
7/22/2021	R30(b)(6) issues	0.1	\$ 500.00	\$	50.00
= /oo /ooo ·	Strategy conference with co-		4	_	
7/30/2021	counsel	0.2	\$ 500.00	\$	100.00
	Reviewed draft email				
11	regarding deposition				
7/30/2021	scheduling	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
8/5/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Scanned defendant's				
8/10/2021	discovery dispute letter	0.1	\$ 500.00	\$	50.00
- / - /	Strategy conference with co-				
8/13/2021	counsel	0.2	\$ 500.00	\$	100.00
	Reviewed and revised status				
8/13/2021	letter to court	0.4	\$ 500.00	\$	200.00
	Reviewed cover email to co-	_			
8/13/2021	counsel	0.1	\$ 500.00	\$	50.00
	Reviewed draft status letter				
8/19/2021	to court, email to co-counsel	0.1	\$ 500.00	\$	50.00
	Strategy conference with co-				
8/22/2021	counsel	0.3	\$ 500.00	\$	150.00
	Conference with court				
	regarding discovery and				
	scheduling issues, drafted				
8/23/2021	notes	0.7	\$ 500.00	\$	350.00
	Reviewed draft email to				
8/23/2021	opposing attorney	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
8/24/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 32 of 36 HENAO V. PARTS AUTHORITY

	Conference with co-counsel				
	regarding search terms and				
8/27/2021	tasks needed	0.2	\$ 500.00	\$	100.00
	Reviewed search terms,				
8/27/2021	email to co-counsel	0.3	\$ 500.00	\$	150.00
	Reviewed omnibus follow-up				
8/27/2021	email to defense counsel	0.1	\$ 500.00	\$	50.00
	Reviewed letter from				
	defendant to court regarding				
8/31/2021	suggested next steps	0.1	\$ 500.00	\$	50.00
	Strategy emails with co-				
9/8/2021	counsel	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
9/8/2021	strategy email to co-counsel	0.4	\$ 500.00	\$	200.00
	Strategy conference with co-				
9/8/2021	counsel, drafted notes	0.2	\$ 500.00	\$	100.00
	Reviewed court order,				
9/8/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Researched options for				
9/8/2021	response to court order	0.8	\$ 500.00	\$	400.00
	Strategy emails with co-				
9/8/2021	counsel	0.1	\$ 500.00	\$	50.00
	Reviewed emails regarding				
9/9/2021	tasks needed	0.1	\$ 500.00	\$	50.00
	Email to co-counsel				
	regarding pros and cons of				
	transfer back to District of	_			
9/9/2021	Arizona	0.1	\$ 500.00		50.00
9/9/2021	Reviewed court filings	0.1	\$ 500.00	\$	50.00
	Researched ability to bring				
2/2/222	Arizona state claim, email to		4		
9/9/2021	co-counsel	0.5	\$ 500.00	\$	250.00
0 /0 /0004	Spoke to co-counsel		4 = 00 00		100.00
9/9/2021	regarding options	0.2	\$ 500.00	\$	100.00
	Reviewed documents				
0/42/2024	relevant to transfer back to	0.2	¢ 500.00	.	450.00
9/13/2021	District of Arizona	0.3	\$ 500.00	\$	150.00
	Drafted letter to court				
0/12/2021	regarding possible transfer	0.4	¢ 500.00	۲	200.00
9/13/2021	back to District of Arizona	0.4	\$ 500.00	\$	200.00
0/12/2021	Researched and drafted	1.4	¢ 500 00	.	700.00
9/13/2021	letter to SDNY	1.4	\$ 500.00	\$	700.00

Case 1:19-cv-10720-LGS-BCM Document 204-2 Filed 03/18/22 Page 33 of 36 HENAO V. PARTS AUTHORITY

	Conference with co-counsel				
9/13/2021	regarding settlement	0.1	\$ 500.00	\$	50.00
·	Researched authority for				
9/13/2021	letter to court	0.5	\$ 500.00	\$	250.00
, ,	Reviewed and revised letter			-	
	to court regarding Cyprian				
9/13/2021	transfer issue	0.3	\$ 500.00	\$	150.00
	Strategy conference with co-				
9/15/2021	counsel	0.4	\$ 500.00	\$	200.00
9/16/2021	Conference with client	0.2	\$ 500.00	\$	100.00
	Email proposing settlement				
9/16/2021	to opposing attorney	0.2	\$ 500.00	\$	100.00
	Reviewed email, recorded				
9/17/2021	Scheduling	0.1	\$ 500.00	\$	50.00
	Email with opposing attorney				
9/17/2021	regarding settlement terms	0.3	\$ 500.00	\$	150.00
	Meet and confer call, drafted				
9/20/2021	notes	1.0	\$ 500.00	\$	500.00
	Discovery dispute call,				
9/22/2021	drafted notes	0.7	\$ 500.00	\$	350.00
	Reviewed draft letter to				
	court regarding rescheduling				
9/30/2021	hearing	0.1	\$ 500.00	\$	50.00
	Reviewed court order,				
10/2/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
	Reviewed email regarding				
	tasks needed, response to co-				
10/4/2021	counsel	0.1	\$ 500.00	\$	50.00
	Strategy conference with co-				
	counsel regarding discovery				
10/6/2021	issues	0.2	\$ 500.00	\$	100.00
	Prepared for discovery meet		4		
10/6/2021	and confer call	0.6	\$ 500.00	\$	300.00
	Discovery meet and confer		4 =		
10/6/2021	call, drafted notes	0.8	\$ 500.00	\$	400.00
40/44/000	Reviewed court order,		4 500 55	٠,	
10/14/2021	recorded scheduling	0.1	\$ 500.00	\$	50.00
40/45/2024	Strategy conference with co-	0.0	d 500 00	.	450.00
10/15/2021	counsel	0.3	\$ 500.00	\$	150.00
40/45/2024	Settlement email to	0.4	¢ 500 00	۸ .	50.00
10/15/2021	opposing attorney	0.1	\$ 500.00	\$	50.00
10/17/2021	Efforts to cover deposition	0.4	\$ 500.00	\$	200.00

10/20/2021	Emails regarding settlement	0.1	\$ 500.00	\$ 50.00
	Reviewed court order,			
10/20/2021	recorded scheduling	0.1	\$ 500.00	\$ 50.00
	Spoke to co-counsel			
10/21/2021	regarding deposition issue	0.1	\$ 500.00	\$ 50.00
	Settlement email to			
10/22/2021	opposing attorney	0.1	\$ 500.00	\$ 50.00
	Phone conference with			
	opposing attorney regarding			
	settlement numbers, email			
10/22/2021	to co-counsel	0.2	\$ 500.00	\$ 100.00
	Prepped to prepare plaintiff			
10/22/2021	for deposition	3.6	\$ 500.00	\$ 1,800.00
10/23/2021	Prepped deponent	1.0	\$ 500.00	\$ 500.00
	Reviewed deponent's			
10/23/2021	documents	0.2	\$ 500.00	\$ 100.00
	Called plaintiff to obtain			
10/25/2021	evidence	0.1	\$ 500.00	\$ 50.00
	Called plaintiff regarding			
10/29/2021	document productions	0.1	\$ 500.00	\$ 50.00
	Tried to reach plaintiff for			
10/30/2021	deposition preparation	0.2	\$ 500.00	\$ 100.00
	Email to co-counsel			
10/30/2021	regarding settlement	0.1	\$ 500.00	\$ 50.00
	Spoke to plaintiff, scheduled			
10/30/2021	deposition preparation	0.1	\$ 500.00	\$ 50.00
	Prepared for deposition			
10/30/2021	preparation	0.4	\$ 500.00	\$ 200.00
- 1- 1	Prepared for deposition	_		
10/31/2021	preparation	0.1	\$ 500.00	\$ 50.00
	Tried to reach plaintiff for		4	
10/31/2021	deposition preparation	0.2	\$ 500.00	\$ 100.00
10/31/2021	Deposition preparation	0.7	\$ 500.00	\$ 350.00
	Emails to plaintiff and			
1. 15.55	opposing attorney regarding	_		
11/1/2021	deposition	0.1	\$ 500.00	\$ 50.00
	Reviewed email from			
	plaintiff, spoke to plaintiff			
	regarding need to appear for		4	
11/1/2021	deposition	0.2	\$ 500.00	\$ 100.00
4.0 1.0 1.0	Efforts to reschedule	•	4 =	
11/1/2021	deposition	0.4	\$ 500.00	\$ 200.00

	Strategy conference with co-			
11/1/2021	counsel	0.2	\$ 500.00	\$ 100.00
	Reviewed emails, efforts to			
11/2/2021	reschedule deposition	0.2	\$ 500.00	\$ 100.00
, ,	Called plaintiff regarding			
11/3/2021	deposition	0.1	\$ 500.00	\$ 50.00
11/3/2021	Strategy conference	0.3	\$ 500.00	\$ 150.00
11/3/2021	Called deponent	0.1	\$ 500.00	\$ 50.00
	Discovery conference with			
11/4/2021	court, drafted notes	1.6	\$ 500.00	\$ 800.00
	Spoke to opposing attorney,			
	drafted notes, emails to co-			
11/4/2021	counsel	0.2	\$ 500.00	\$ 100.00
	Reviewed court order,			
11/5/2021	recorded scheduling	0.1	\$ 500.00	\$ 50.00
	Called Heneo and M.			
	Williams again regarding			
11/8/2021	deposition scheduling	0.1	\$ 500.00	\$ 50.00
	Emails with co-counsel			
	regarding deposition			
11/8/2021	scheduling	0.2	\$ 500.00	\$ 100.00
	Quick review of ESI protocol,			
11/8/2021	cmail to co-counsel	0.2	\$ 500.00	\$ 100.00
	Strategy conference with co-			
11/9/2021	counsel	0.3	\$ 500.00	\$ 150.00
11/11/2021	Draft settlement email	0.1	\$ 500.00	\$ 50.00
11/11/2021	Effort to settle claim	0.3	\$ 500.00	\$ 150.00
	Reviewed email from			
	opposing attorney, response			
11/11/2021	email	0.2	\$ 500.00	\$ 100.00
	Sent revised settlement			
11/11/2021	demand	0.2	\$ 500.00	\$ 100.00
	Conference with co-counsel,			
11/11/2021	efforts to settle case	0.4	\$ 500.00	\$ 200.00
	Settlement email to			
11/11/2021	opposing attorney	0.1	\$ 500.00	\$ 50.00
	Reviewed draft response			
11/15/2021	email to opposing attorney	0.1	\$ 500.00	\$ 50.00
	Reviewed checks transmittal			
1/11/2022	letter, email to co-counsel	0.3	\$ 500.00	\$ 150.00

	Reviewed proposed order,			
1/11/2022	email to co-counsel	0.1	\$ 500.00	\$ 50.00
	Reviewed edits to checks			
1/12/2022	transmittal letter	0.1	\$ 500.00	\$ 50.00
	Strategy conference with co-			
1/20/2022	counsel	0.2	\$ 500.00	\$ 100.00
	Reviewed checks letter,			
1/20/2022	email to co-counsel	0.2	\$ 500.00	\$ 100.00
		275.7		\$ 137,850.00